

SUBCHAPTER 3.4  
CULTURAL RESOURCES

### **3.4     Cultural Resources**

The 1981 Sycamore Springs EIR identified cultural resources impacts as less than significant. A cultural survey was conducted by Westec Services in 1979 in the southern portion of the Project site (south of Pala Mesa Heights Drive). Two isolates (artifacts not associated with other cultural material) were discovered during this survey. The 1981 EIR stated that these two isolates were not significant cultural resources due to their isolated nature and the disturbance surrounding them. The 1981 EIR, however, also acknowledged that the area has a high potential for unknown archaeological resources and recommended that an archaeological monitor be present during initial grading in the vicinity of the isolates' location.

In 1982, RECON conducted a cultural survey of the north-central portion within the original property boundaries. No additional cultural resources were located, although the 1983 Hewlett-Packard EIR also acknowledged the presence of isolates on site. The conclusion reached at that time, however, was that since the isolates were not significant, impacts to cultural resources overall would be less than significant and no mitigation (i.e., collection of the isolates or monitoring during grading activities) would be required.

Since the 1983 EIR was certified, the Project site has been expanded to include property north of Pala Mesa Height Drive, and off-site areas associated with Horse Ranch Creek Road have been added to the Proposed Project, as has the potential for impacts at off-site intersections resulting from required mitigation for Project-related traffic effects. The County also has modified required mitigation standards. These changed conditions result in a need for re-evaluation regarding potential impacts.

The assessment of the Proposed Project's potential to have an adverse effect on cultural resources is based on the following technical resource studies: (1) Campus Park Cultural Resources Survey prepared by Sue Wade (Heritage Resources 2007) regarding on site resources; (2) Cultural Resources Survey, Archaeological Testing, and Evaluation for the Proposed Meadowood Project (TM5345RPL/SP04-001/R04-005/S04-006/S04-007/Log No. 04-02-004) prepared by ASM Affiliates, Inc. (ASM 2006) regarding off-site resources associated with future Horse Ranch Creek Road; and (3) Campus Park/Passerelle Off-site Road Improvements Cultural Resource Survey prepared by Sue Wade (Heritage Resources 2009). The Campus Park Cultural Resources Survey and Campus Park/Passerelle Off-site Road Improvements Cultural Resource Survey are included as Appendix H of the EIR, with confidential records and maps on file at DPLU, and deposited with the South Coastal Information Center (SCIC). The results of the analyses are summarized below.

#### **3.4.1    Existing Conditions**

The presence and significance of existing cultural resources associated with the Proposed Project were determined using the methodologies described below.

##### ***Methodology***

Methodologies include a review of institutional records, reports, and historic maps of the Project area and immediate vicinity. In addition, an assessment of an 1928 aerial photograph of the Project site, a field survey of the northern portion (previously unsurveyed) of the site, and a field update of the southern portion (previously surveyed) of the site were conducted.

The evaluation of cultural resources is in conformance with the County RPO, Sections 21083.2 and 21084.1 of the Public Resources Code, and the CEQA Guidelines. Statutory requirements of CEQA Guidelines (Section 15064.5) were followed in evaluating the significance of the cultural resources.

### ***Records Search Results***

Record searches were conducted at the SCIC and San Diego Museum of Man. According to the records, there have been 17 cultural resource studies conducted within a one-mile radius of the Project site. These studies were completed by Carrico (1997 and 1983), Corum (1977), County (1998), Eckhardt (1978), Hatley (1978), Kasper and Crotteau (1981), RECON (1981, 1982, and 1984), Rosen (1978 and 1982), Rosen and Crafts (1994), Rosenthal et al. (1987), Smith (1990), Westec (1980), and Whitehouse and Cheever (1990). Five archaeological sites and two isolates were recorded within a one-mile radius of the Project site as a result of these surveys. All of these sites have been recorded on low slopes above the alluvial valley bottoms, and the site record forms consistently note poor visibility due to vegetation.

The southern two-thirds of the Project site (south of Pala Mesa Heights Drive) has been surveyed twice in the past, once by Westec Services (Breece 1979) and once by RECON (Hector 1982). Two isolates (one mano and one mano fragment) were discovered during the Westec survey that was completed during conditions of good visibility (terrain that had been recently plowed or was cleared for orange groves). Given the archaeological sensitivity of the area, it was recommended that a qualified archaeologist monitor any initial grading in the area of the isolates. No map was provided in the original report depicting the location of the isolates. The RECON survey concentrated on the low ridges above the main drainage. No resources were found, and it was suggested that the topographically rugged area may have been used for hunting and could not support a more extensive use.

### ***Campus Park Field Survey***

The purpose of the cultural resources survey was to relocate previously recorded resources and identify any new sites. Archaeological fieldwork for the Proposed Project was completed in May 2003. Because the southern two-thirds of the Project site had been surveyed twice before, this area was evaluated to assess any changes in status. The survey conditions of the previous fieldwork were excellent; however, weedy conditions were noted during a drive through. Therefore, no re-survey of the southern two-thirds of the property was deemed warranted.

The latest on-site survey focused on the northern one-third of the property (north of Pala Mesa Heights Drive) where no survey previously had been conducted. As illustrated by the 1928 and 1953 aerial photographs, this area was engaged in agriculture (hayfields and orchards) for at least 80 years. The surveyed area was rocky and characterized by old furrows and heavily eroded gullies trending east to west. A dense thicket of weeds and brush three to five feet tall was present in this area of the site.

The archaeological remains of two structure complexes identified on the historic maps and photographs were located on slopes south of the largest drainage. At the complex located lower on the slope, the remains of a well, building debris, a power pole, pepper trees and eucalyptus trees were discovered across several graded and overgrown pads, where indicated by the 1928 aerial photograph. Building debris, such as plaster, roofing material, tiles, concrete and wood, has been pushed into the adjacent gully.

A lower third structure is the site of a standing and (during survey) occupied building. In addition, several small sheds and storage structures were present. None of the current structures appears to be an original structure shown on the 1953 aerial photograph (one is a modular structure), and they are of no architectural distinction or significance. A graded pad northeast of the structures currently exists. One trash dump (dating to the post-1940s occupation of the property) was discovered in a wide gully just north of the existing structure. Screw-top bottles and plastic containers demonstrate the recent origins of this trash. The post-1940s structural demolition debris and recent structures and trash deposits contain no architectural or informational value to qualify as significant under CEQA or County criteria.

The remainder of the survey focused on inspection of the ridge and knoll tops at the northwestern portion of the survey area. These areas were extensively covered in weeds and ground visibility was very poor. Bedrock outcrops were inspected with negative results; sufficient visibility was present on these ridge tops to conclude that no prehistoric materials were present. No prehistoric sites were located on the northern portion of the property during the survey.

### ***Off-site Intersections Field Survey***

A field inspection (primarily a windshield survey) was conducted July 23, 2008, to compare the results of the previously conducted surveys to the proposed off-site improvement areas, as well as to identify areas disturbed by grading, excavation, and cultivation. On-the-ground inspections were necessary in a few areas that had not been previously surveyed and had not been extensively disturbed. The Pankey Road alignment addressed under the refined Project was assessed as part of the Campus Park West review by Heritage Resources in 2004.

### ***On-site Significant Cultural Resources***

The research and field studies at the Project site indicate that discovery of archaeological sites may have been hampered by historic land alterations and dense vegetation. It is possible that archaeological deposits could be buried in alluvial depositional situations in the valley bottomlands. Only two isolates were discovered during the previous surveys on the southern portion of the property. The Project archaeologist for the 1979 survey (Breece) recommended monitoring of grading activities to ensure that additional site deposits are not present. The current survey of the northern portion of the property encountered poor surface visibility conditions because of dense vegetation and steep eroded topography. Although no prehistoric sites and no significant historic artifact deposits were located in the northern portion of the Project site, it is possible that resources could be present but undiscovered due to poor survey conditions or alluvial deposition.

### ***Off-site Significant Cultural Resources***

The Proposed Project includes the extension of Pala Mesa Drive and Pankey Road from the currently closed Pala Mesa Drive bridge that spans I-15 east and south through the adjacent proposed Campus Park West property. The Campus Park West property north of SR 76 included the horse track, a concrete slab and a small outbuilding (likely a hay shed, garage or tack building) originally associated with the larger Rancho San Luis Rey horse breeding and training facility of the 1930s/1940s. Following survey, Heritage concluded that: "...the portion of the Rancho San Luis Rey facility remaining on the Pappas property does not possess sufficient integrity to meet significance or eligibility criteria."

The Proposed Project also includes the off-site construction of Horse Ranch Creek Road from the realigned SR 76 north through the southernmost portion of the future Meadowood development. In 1947, D.L. True recorded site CA-SDI-682, known in the archaeological literature as the Pankey Site (ASM 2006). The Pankey Site, located within and to the east of Meadowood property, was identified as the village of *Tom-Kav*. True continued his work on the site over the following decades and in 1985, along with Mrs. Rosemary Pankey proposed that radiocarbon data indicated that the early Pauma complex occupation represented seasonal use of the interior areas by coastal populations. The known portion of CA-SDI-682 was mapped by True (et al.) in 1991. In the site maps prepared by True, artifacts and features associated with the site were not shown as extending west of the existing ranch road (just east of the proposed Horse Ranch Creek Road alignment).

ASM staff conducted a cultural resources field survey for the Meadowood property in September/October 2003 in compliance with the County CEQA guidelines and determined that additional archaeological

testing was required. Subsequently, ASM staff conducted limited trenching on the west side of the ranch road to determine if subsurface deposits related to the Pankey Site extended west of the road. Archaeological deposits were identified in initial backhoe trenches. Between September 2004 and January 2005, subsurface archaeological testing was conducted on the Meadowood property. Based on the results of that testing, the boundaries of CA-SDI-682 were expanded west of the ranch road to include three newly identified archaeological deposits identified as loci A, B and C.

The Pankey Site is RPO significant and has been determined to be eligible for listing on the California Register of Historical Resources and National Register of Historic Places. The site, including two of the newly identified archaeological deposits that have relatively small portions of intact midden, also is considered a County RPO resource and, as such, impacts to the site must be protected and avoided.

Improvements associated with the proposed Horse Ranch Creek Road/SR 76 intersection are located near the above-referenced Pankey Site (CA-SDI-682), as well as the possible location of the Rancho Monserate adobe (identified based on historic map notations as being at the foot of Monserate Mountain near the village of *Tom-Kav*, but without any evidence of it noted during survey).

### ***Native American Consultation***

The analysis of on-site components did not indicate any Native American religious, ritual, or other special activities. Pursuant to California Government Code 65352.3, Native American consultation was initiated in 2005. The NAHC was contacted, as was a number of Native American individuals/bands/organizations potentially knowledgeable regarding cultural resources in the area. Representatives of the Cupa Cultural Center; La Jolla Band of Luiseño Indians; and the Pala, Pauma/Yuima, Pechanga, Rincon, San Luis Rey, Soboba, and Twenty-Nine Palms Bands of Mission Indians were contacted. The reader is referred to Chapter 7.0 of this EIR for a complete list of contacts. Responses were received from the Soboba and San Luis Rey Bands of Mission Indians. Consistent with comments in the letter from the San Luis Rey Band, mitigation measures (detailed in Section 3.4.6 below) require the presence of a Native American monitor during grading, excavation or other ground-breaking activities within previously undisturbed soils during construction. Because of the significance of the San Luis Rey River valley to the local Luiseño Tribes, and because of the length of time since the last consultation letter went out, the County has re-contacted the NAHC, again requesting an updated tribal list for consultation. A consultation letter has been recently sent to the tribes listed on the NAHC response letter dated September 29, 2008. Two consultation meetings were held with regard to Horse Ranch Creek Road off-site improvements near site SDI-682; one was held at County offices (January 26, 2009) and a field visit occurred on March 6, 2009. Native American participants requested the presence of Native American grading monitors, in particular in the SDI-682 area. As a result of the later request for tribal consultation, additional written responses were received from Pechanga Band of Mission Indians and Rincon San Luiseño Band of Mission Indians also requesting the presence of Native American monitors during ground disturbing activities associated with the Proposed Project.

### **3.4.2 Guidelines for the Determination of Significance**

#### ***Guidelines of Significance***

A significant impact to cultural resources would occur if:

1. As identified by CEQA:
  - a. The Project, as designed, causes a substantial adverse change in the significance of an historical resource as defined in §15064.5 of the CEQA Guidelines.

- b. The Project, as designed, causes a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines.
- c. The Project, as designed, disturbs any human remains, including those interred outside of formal cemeteries.

- 2. The Project is inconsistent with the County RPO relative to prehistoric and historic sites.

### ***Guideline Sources***

Guideline Nos. 1a and 1b are derived directly from CEQA Guidelines. Sections 21083.2 of the Public Resources Code and Section 15064.5 of the CEQA Guidelines recommend evaluating historical and archaeological resources to determine whether or not a proposed action would have a significant effect on unique historical or archaeological resources. Guideline No. 1c is included because human remains must be treated with dignity and respect and CEQA requires consultation with the “Most Likely Descendant” (MLD) as identified by the NAHC for any project in which human remains have been identified. Guideline No. 2 was selected because cultural resources are protected under the County RPO. The RPO does not allow non-exempt activities or uses damaging to significant prehistoric or historic lands under County jurisdiction. The only exempt activity is scientific investigation. The Project is required to be in conformance with applicable County standards related to cultural resources, including the noted RPO criteria on prehistoric and historic sites. Non-compliance would result in a project that is inconsistent with County standards. Any project that would have an adverse impact (direct, indirect, and cumulative) on significant cultural resources as defined by these guidelines would be considered a significant impact.

The Proposed Project addressed as part of the pre-1988 approved Sycamore Springs Specific Plan (south of Pala Mesa Heights Drive), as well as the northern parcel, are exempt from the County RPO. However, the off-site locales affected by Project implementation would be subject to the RPO, including the noted RPO criteria on prehistoric and historic sites. Non-compliance would result in a project that is inconsistent with County standards.

### **3.4.3 Analysis of Project Effects and Determination as to Significance**

According to the CEQA Guidelines (Section 15126.4(b)(3)), “public agencies should, whenever feasible, seek to avoid damaging effects on any historical resource of an archaeological nature.” The section also requires the consideration of preservation in place as the preferred manner of mitigation. Data recovery is permitted when preservation is not feasible.

An analysis of each site is provided below along with a determination as to the significance of the site, pursuant to Section 15064.5 of the CEQA Guidelines and the County RPO.

#### ***Historical Resources (Guideline No. 1a)***

##### **On-site Historical Resources**

As a result of the site survey, several structures were evaluated for significance. These sites include an occupied building and associated ancillary buildings (sheds, storage), as well as the remains of two structure complexes, a well, and building debris. These structures were determined to be not significant according to CEQA and RPO because they do not contain historic, architectural, or informational value. Therefore, impacts to on-site historic resources would be **less than significant**.

### Off-site Historical Resources

No structural resources were identified associated with off-site improvements. As a result, impacts to off-site historic structures would be **less than significant**.

### ***Archaeological Resources (Guideline No. 1b)***

#### On-site Archaeological Resources

The records search and field studies described above have demonstrated that, although important archaeological (prehistoric) resources have been documented in the Project vicinity, discovery of sites has been, and continues to be, hampered by historic land alterations and dense vegetation. Excluding the potential location of two isolates, no prehistoric resources were located on the Project site during the three archaeological surveys conducted on site. There is the potential that brushing and initial grading activities associated with construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant, archaeological resources. Impacts to uncovered cultural resources on site would be **significant**. (**Impact CR-1a**)

#### Off-site Archaeological Resources

No prehistoric sites have been recorded along the proposed alignment of Pankey Road or Pala Mesa Drive on the adjacent Campus Park West property. Elements of the 1930s/1940s Rancho San Luis Rey thoroughbred facility were located on Campus Park West property, including a track and outbuilding(s)/shed(s). Excluding the track and concrete pad, nothing remains visible of this use. Depending on the ultimate location of Pankey Road across the property, it may also cross the facility area. No subsurface elements are indicated or previously recorded. A previously recorded archaeological site, Pankey Site (CA-SDI-682), which also potentially incorporates elements of the Monserate adobe, is located adjacent to existing SR 76 and the future off-site extension of Horse Ranch Creek Road. As described above, cultural resources survey and archaeological testing were conducted at that site by ASM (Hector 2005, Hector et al. 2006, and Cook 2008). The survey identified three additional deposits associated with CA-SDI-682 (loci A, B, and C). Locus "C," located on Meadowood property, was determined not significant and therefore is not further discussed. The survey report recommended that loci A and B adjacent to future Horse Ranch Creek Road be avoided and capped as part of the Meadowood Project. Since then, the road was realigned by the Meadowood Project to avoid impacts to loci A and B. Horse Ranch Creek Road, which would be constructed as part of the Proposed Project, would follow the same alignment and also would avoid the identified loci.

Similar to on-site activities, there is the potential that brushing and initial grading activities associated with construction of the Proposed Project off site (including construction of the final Pankey Road alignment across Campus Park West) could result in the discovery of previously unrecorded, potentially significant, archaeological sites. Such impacts to uncovered off-site cultural resources would be **significant**. (**Impact CR-1b**)

In addition, if construction of off-site improvements takes place within 100 feet of the site, there is potential for impacts to CA-SDI-682/Monserate adobe. Such impacts would be **significant**. (**Impact CR-1c**)

### ***Human Remains (Guideline No. 1c)***

No human remains were discovered during the site surveys. Although unlikely, if human remains are unearthed during grading activities, a **significant impact** would occur. (**Impact CR-1d**)

### **Resource Protection Ordinance (Guideline No. 2)**

As discussed in Subchapter 1.1, Project Description and Location, and 3.3, Biological Resources, of this EIR, the Proposed Project (on site) is exempt from the RPO and **no impacts** are identified for this issue. (Regardless, the lack of significant resources on site, as described for Guideline No. 1 above, indicates that the Project would not have any impacts identified for this issue if it were subject to the RPO.) With regard to off-site resources, the Project must comply with RPO regulations. The monitoring program identified in Section 3.4.6 as mitigation for potential cultural resources impacts CR-1a through CR-1d, above, would ensure that any newly discovered resources would be appropriately reviewed and treated during project construction activities.

### **3.4.4 Cumulative Impact Analysis**

According to CEQA, the importance of cultural resources comes from the research value and the information that they contain. Therefore, the issue that must be explored in a cumulative analysis is the cumulative loss of that information. For sites considered less than significant, the information is preserved through recordation, test excavations and preservation of artifacts. Significant sites that are placed in protected open space easements avoid direct impacts to these cultural resources as well as preservation of their potential research data. Significant sites that are not placed within open space easements and directly impacted by the project preserve the information through recordation, test excavations, and data recovery programs that would be presented in reports and filed with the County and SCIC. The artifact collections from any potentially significant site would be curated at a federally approved curation facility such as the San Diego Archaeological Center and would be available to researchers for further study. Because cultural resources are non-renewable in nature, it is critical that information obtained through excavation is appropriately retained and utilized.

Within the Project site, two archaeological isolates (one mano and one mano fragment) were discovered; these are not CEQA-significant cultural resources, nor do they meet the criteria for listing in the California Register of Historical Resources. No other on-site cultural resources were located, and no known significant impacts to off-site resources have been identified. Known impacts, therefore, would not result in any significant contribution to regional impacts to cultural resources.

There is, however, an identified potential for impacts to subsurface deposits or features that are currently not recorded. This potential results in a conservative assessment that Project implementation could contribute to regional cumulative effects for this issue. As a result of this conservative assessment, the following review was undertaken.

The cultural resources cumulative study area was identified based on potential future research questions that could be developed within the context of subsistence and settlement models for the Project area. Major east-west drainages were the travel corridors utilized by prehistoric occupants in their seasonal rounds. The confluences of drainages are often major habitation site locations, with associated temporary camps and resource procurement stations established on surrounding tributaries and on adjacent uplands. The San Luis Rey River valley comprised a major travel corridor and its confluence with the Project tributary (Horse Ranch Creek) was a focus of prehistoric habitation. The ethnographic village of *Tom-Kav* (CA-SDI-682; the Pankey Site), is documented to the southeast of the Project. Although the lands surrounding *Tom-Kav* have been heavily impacted, there have been sufficient cultural resource sites noted and recorded to demonstrate that a similar prehistoric pattern—an occupation base surrounded by special use sites—also existed in this area of the San Luis Rey River valley.



Because archaeological data collection often is focused on addressing settlement and subsistence research questions, the cultural resources cumulative impacts study area was focused on the confluence of the San Luis Rey river valley and the north-trending tributary drainage of which *Tom-Kav* is the center. The cultural resources cumulative study area extends down the river valley to the next major tributary drainage at Gird Road and Via Monserate and up the river valley to the major drainage at Rice Canyon. The cumulative study area extends north up Horse Ranch Creek to the headwater near Mission Road (Figure 3.4-1).

Based on SCIC records, 98 archaeological surveys or reviews have occurred since 1977 within this area (many focused on the same, or different aspects of the same, development projects). A total of 42 development projects are known to have been processed or are currently being processed in the County DPLU. Table 1-15 presents information on these projects gathered from DPLU records, Heritage Resources archives, and a record search performed for the cumulative study area at SCIC. Of the 42 projects, 12 would have no impacts to cultural resources due to negative surveys, 22 would have less than significant impacts to cultural resources (based on County file information), and 2 projects have no impact data available due to their early status in processing. Six projects have incorporated measures to avoid known significant impacts; however, potentially significant impacts would remain due to the potential for buried resources. These six projects have incorporated grading monitoring programs to ensure that if buried resources are present, they would be identified, assessed for significance and proper recordation, avoidance, and data-recovery measures would be undertaken. Three of the six projects (Meadowood, Campus Park West, and Palomar College North), in addition to the Proposed Project, incorporate monitoring to ensure there would be no unmitigated impacts to the village site of *Tom-Kav* (CA-SDI-682) or the Monserate adobe, should such remains be encountered. The remaining three (Dien N Do Subdivision, Gregory Landfill, and Bonsall Subdivision) incorporate monitoring to protect against inadvertent impacts to known, as well as buried, resources.

The Proposed Project's potentially significant impacts to cultural resources would be reduced below a level of significance by archaeological monitoring by a County-approved archaeologist and a monitor representing the local Luiseño Tribes during grading of both on- and off-site grading activities. Similarly, impacts to any undiscovered or buried potentially significant cultural resources located within the cumulative projects' boundaries would be reduced below a level of significance by similar measures. Thus, all archaeological impacts associated with the related cumulative projects are expected to be less than significant and/or fully mitigated.

Future development within the cumulative study area would be subject to similar analysis and mitigation requirements pursuant to CEQA and RPO. Based on the compliance of the Proposed Project and related projects within the cultural resources cumulative study area with CEQA and RPO, and implementation of the Project monitoring measures presented in Section 3.4.6, the Proposed Project would not result in a significant contribution to cumulative impacts for the issue of cultural resources and impacts would be **less than significant**.

### 3.4.5 Significance Prior to Mitigation

The following potential significant impacts could occur with Project implementation:

- Impact CR-1a On-site brushing and initial grading activities associated with construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant, archaeological resources. Such impacts to uncovered cultural resources on site could be significant.

- Impact CR-1b Off-site brushing and initial grading activities associated with construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant, archaeological resources. Such impacts to uncovered cultural resources off site could be significant.
- Impact CR-1c Off-site brushing and initial grading activities occurring within 100 feet of CA-SDI-682/Monserate adobe associated with construction of off-site improvements could impact the site. Such impacts could be significant.
- Impact CR-1d A significant impact would occur if human remains are unearthed during grading activities.

### 3.4.6 Mitigation

#### M-CR-1a, 1b, and 1d

Direct impacts to buried, previously unrecorded cultural resources would be mitigated through the implementation of a grading monitoring program for both on-site development and off-site improvements. Prior to approval of grading or improvement plans, the Project Applicant shall implement a grading monitoring and data recovery program to mitigate potential impacts to undiscovered buried archaeological resources on the Project site to the satisfaction of the Director of DPLU. This grading monitoring program shall include, but not be limited to, the following actions:

1. Provide evidence to the DPLU that a County-approved archaeologist (consulting archaeologist) has been contracted to implement a grading monitoring and data recovery program to the satisfaction of the Director of DPLU. A letter from the consulting Project Archaeologist shall be submitted to the Director of DPLU. The letter shall include the following guidelines:
  - a. The consulting archaeologist shall contract with a Luiseño Native American monitor to be involved with the grading monitoring program.
  - b. The consulting County-approved archaeologist/historian and Luiseño Native American monitor shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program as outlined in the County of San Diego Report Format and Content Guidelines – Cultural Resources: Archaeological and Historic Resources (December 5, 2007).
  - c. The consulting archaeologist shall monitor all areas identified for development.
  - d. An adequate number of monitors (archaeological/historical/Native American) shall be present to ensure that all earthmoving activities are observed and shall be on site during all grading activities.
  - e. During the original cutting of previously undisturbed deposits, the archaeological monitor(s) and Luiseño Native American monitor(s) shall be on site full time. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Principal Investigator in consultation with the Native American monitor. Monitoring of cutting of previously disturbed deposits will be determined by the Principal Investigator.

- f. Isolates and clearly non-significant deposits shall be minimally documented in the field, and the monitored grading can proceed.
- g. In the event that previously unidentified potentially significant cultural resources are discovered, the archaeological monitor(s), in consultation with the Luiseño Native American Monitor, shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources. The Principal Investigator shall contact the County Archaeologist at the time of discovery. The Principal Investigator, in consultation with the County staff archaeologist and Luiseño Native American monitor, shall determine the significance of the discovered resources. The County Archaeologist must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the County Archaeologist, then carried out using professional archaeological methods.
- h. If any human bones are discovered, the Principal Investigator shall contact the County Coroner. In the event that the remains are determined to be of Native American origin, the MLD, as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains.
- i. Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The Principal Investigator shall determine the amount of material to be recovered for an adequate artifact sample for analysis.
- j. In the event that previously unidentified cultural resources are discovered, all cultural material collected during the grading monitoring program shall be processed and curated at a San Diego facility that meets federal standards per 36 CFR Part 79, and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.
- k. In the event that previously unidentified cultural resources are discovered, a report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the Director of DPLU prior to the issuance of any building permits. The report shall include the following:
  - i. Department of Parks and Recreation Primary and Archaeological Site forms;
  - ii. Evidence from a federally approved curation facility within San Diego County that all cultural material collected during the grading monitoring program has been received for curation accompanied by payment of the fees necessary for permanent curation.
- l. In the event that no cultural resources are discovered, a brief letter to that effect shall be sent to the Director of DPLU by the consulting archaeologist that the grading monitoring activities have been completed.

M-CR-1c

To avoid direct impacts to site CA-SDI-682/Monserate adobe from off-site improvements, a temporary fencing plan shall be implemented. Prior to the start of grading or improvements, the Project Applicant shall implement a temporary fencing plan to mitigate potential impacts to site CA-SDI-682/Monserate adobe to the satisfaction of the Director of DPW. The temporary fencing plan shall include, but not be limited to the following actions:

1. Prepare and implement a temporary fencing plan for the protection of archaeological site CA-SDI-682/Monserate adobe. ~~†The temporary fencing plan shall be implemented under the supervision of a consulting County-approved archaeologist and Luiseño Native American monitor and that~~ consists of the following:
  - a. Prepare and implement a temporary fencing plan for the protection of archaeological site CA-SDI-682/Monserate adobe during any grading activities within 100 feet of said archaeological site(s). The temporary fencing plan shall be prepared in consultation with a consulting County-approved archaeologist and Luiseño Native American monitor. The fenced area shall include a buffer sufficient to protect the archaeological site(s). The fence shall be installed under the supervision of the consulting County-approved archaeologist and Luiseño Native American monitor prior to commencement of grading or brushing and be removed only after grading operations have been completed. The temporary fencing plan shall include the following requirements:

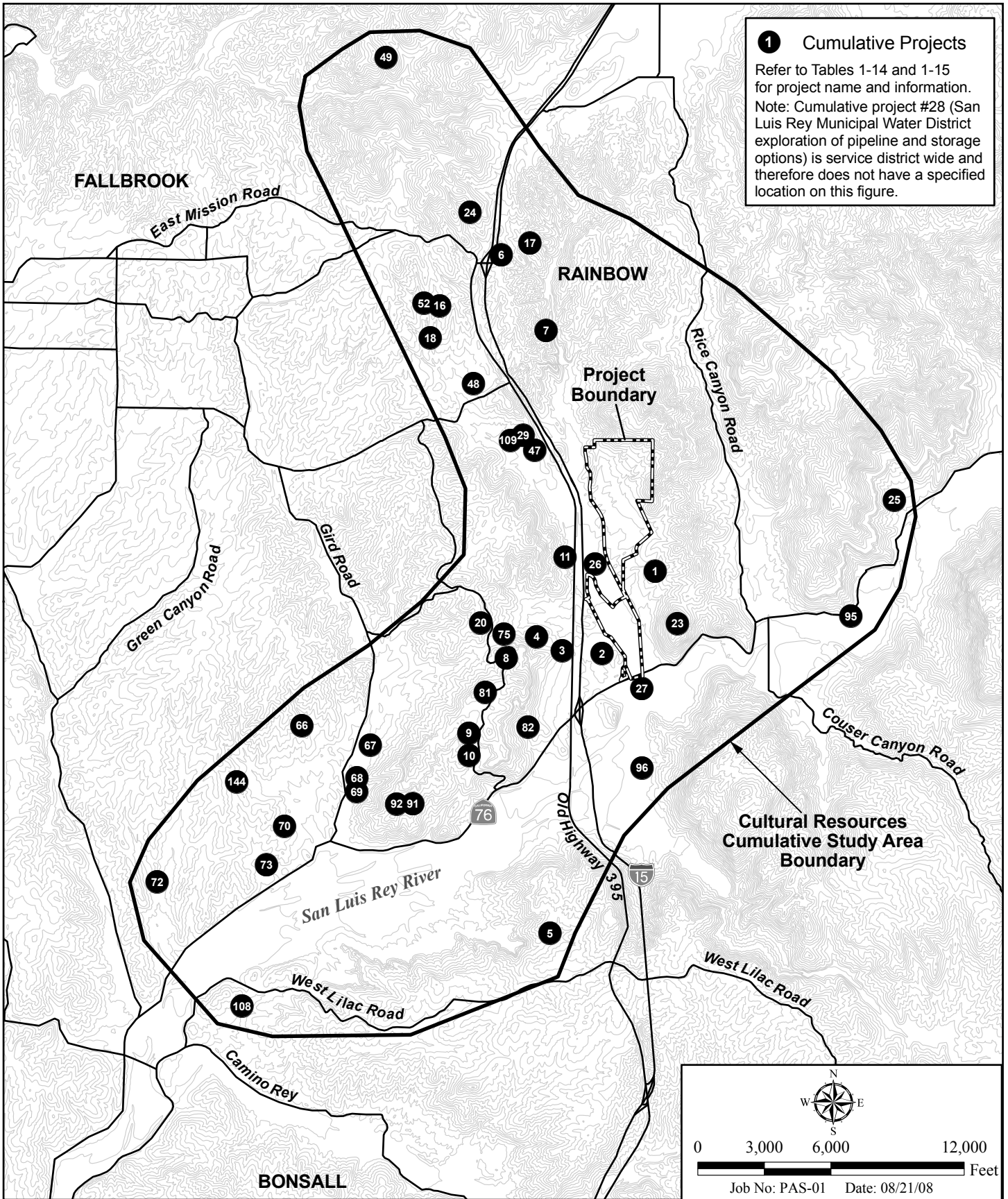
Provide evidence to the Director of DPW that the following notes have been placed on the Grading Plan:

In the event that construction activities are to take place within 100 feet of archaeological site CA-SDI-682/Monserate adobe, the temporary fencing plan shall be implemented under the supervision of a consulting County-approved archaeologist that consists of the following:

- i. The consulting Project archaeologist and Luiseño Native American monitor shall mark known limits of site loci.
- ii. The consulting Project archaeologist and Luiseño Native American monitor shall determine the appropriate portion of Horse Ranch Creek Road for which the limits of proposed road grading will be fenced to ensure that the grading avoids buried deposits.
- iii. Upon approval of the proposed extent of fencing by the County archaeologist, the consulting Project archaeologist and Luiseño Native American monitor shall supervise the fencing installation.
- iv. Submit to the DPW for approval a signed and stamped statement from a California Registered Engineer, or licensed surveyor that temporary fences have been installed in all locations of the Project site where proposed grading or clearing is within 100 feet of the archaeological site CA-SDI-682/Monserate adobe.
- v. Fencing will be removed after the conclusion of construction activities.

### **3.4.7 Conclusion**

The Proposed Project may have significant impacts if unknown artifact deposits or human remains are uncovered or unearthed during brushing and initial grading activities (Impacts CR-1a through 1d). Implementation of the above-described monitoring program (M-CR-1a, 1b, and 1d) and temporary fencing plan (M-CR-1c) would ensure that no significant impacts to prehistoric or historic resources would occur as a result of Project development, thereby also ensuring compliance with CEQA, the County of San Diego Report Format and Content Guidelines – Cultural Resources (December 5, 2007), and California Government Code Section 65352.3 (Senate Bill 18). Implementation of these mitigation measures would reduce the potentially significant impacts to less than significant levels, because they would ensure that relevant information contained in the archaeological record, which is important in understanding prehistory and history, is preserved.



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# Cultural Resources Cumulative Study Area

CAMPUS PARK PROJECT

Figure 3.4-1